



Common Pleas Court of Cuyahoga County, Ohio

Nailah K. Byrd, Clerk of Courts

DS 1285371

MAY 29 2019

**FILED**  
MAY 29 2019  
Clerk of Courts  
Cuyahoga County, Ohio

Defense Subpoena Criminal Rule 17 Worksheet

Case information:

Defendant: Emily McNeeley  
Case number: CR-19-636461-A  
Judge: Patricia Cosgrove  
Courtroom: To be determined  
Attorney/Pro Se Party: Roger M. Synenberg  
Bar number: 0032517  
Phone: 216-622-2727

To summon:

First name: Mark Griffin, Esq.  
Last name: Cuyahoga County Office of Inspector General  
Address #1: 2079 E 9th St  
Address #2 (optional): 6th Floor  
City/State/Zip: Cleveland, Ohio 44115

☒ Attorney Service ☐ Sheriff Service  
☐ Process Server ☐ Other

To the witness:

In lieu of appearance, please provide the materials identified in the attached Duces Tecum.

Appearance:

Date: 6/25/2019  
Time: 1:00 P.M.

Forthwith: ☐ Yes ☒ No

In lieu of E-Filing, this form is provided as a courtesy to allow the Clerk's staff to input information to generate a subpoena. This form is not meant for service. Please deliver the completed form to the 2<sup>nd</sup> floor Justice Center Cuyahoga County Clerk of Courts, Criminal Division.

Per Ohio Criminal Rules of Procedure 17(D): A subpoena may be served by a sheriff, bailiff, coroner, clerk of court, constable, marshal, or a deputy of any, by a municipal or township policeman, by an attorney at law or by any person designated by order of the court who is not a party and is not less than eighteen years of age. Service of a subpoena upon a person named therein shall be made by delivering a copy thereof to such person or by reading it to him in person or by leaving it at his usual place of residence, and by tendering to him upon demand the fees for one day's attendance and the mileage allowed by law. The person serving the subpoena shall file a return thereof with the clerk. If the witness being subpoenaed resides outside the county in which the court is located, the fees for one day's attendance and mileage shall be tendered without demand. The return may be forwarded through the postal service, or otherwise.

**Duces Tecum to the**  
**Cuyahoga County Office of Inspector General**

Provide the following information:

1. The formal and informal opinions issued by the Inspector General's Office since March 1<sup>st</sup>, 2015.
2. The vendor registration records submitted on behalf of Ciber, Inc. to the Office of the Cuyahoga County Inspector General (hereinafter, "OIG").
3. The records related to the background investigation and due diligence performed by the OIG as it relates to the vendor registration of Ciber, Inc, including, but not limited to, records reviewed, searches performed, questions submitted to the vendor, etc.
4. The documentation related to the OIG's procedures for vendor registration including, but not limited to, procedures related to County staff verifying vendor's disclosures and background investigations performed by the OIG prior to 1/1/17, and any changes in the policies and procedures related to vendor registration and any due diligence performed by the OIG after 1/1/17 including the reasons for such changes.
5. The records produced to the Cuyahoga County Prosecutor's office pursuant to subpoenas issued by the Cuyahoga County Prosecutor's Office since January 1, 2018.
6. The files, documents, records, notes, calendar appointments, emails, research, text messages, recordings, investigation details, complaints, allegations, etc. related to any OIG investigation involving Emily McNeeley.

**\*Records should be provided in .pst format where applicable.**

Records may be delivered via fax, e-mail, or mail to the following:

Roger M. Synenberg, Esq.  
Clare C. Moran, Esq.  
Matthew A. Kurz, Esq.  
Synenberg & Associates, LLC  
55 Public Square, Ste. 1331  
Cleveland, Ohio 44113  
Fax: 216-622-2707  
Email: [rsynenberg@aol.com](mailto:rsynenberg@aol.com); [cmoran@synenberg.com](mailto:cmoran@synenberg.com); [mkurz@synenberg.com](mailto:mkurz@synenberg.com)

If you have any questions, please contact Roger Synenberg, Clare Moran or Matthew Kurz at 216-622-2727.